

# EXHIBIT 1

Page 1

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

3 CASE NO.: 24-cv-6563 (LJL)

4 RUBY FREEMAN and WANDREA' MOSS,

5 Plaintiffs,

6 -vs-

7 RUDOLPH W. GIULIANI,

8 Defendant.  
9 \_\_\_\_\_/

10 West Palm Beach Marriott  
11 1001 Okeechobee Blvd  
12 West Palm Beach, FL 33401

13 DATE: Thursday, December 26, 2024  
14 TIME: 4:06 p.m. - 5:42 p.m.

15  
16 VIDEO DEPOSITION OF MONSIGNOR ALAN PLACA  
17  
18  
19  
20  
21

22 Taken on behalf of the PLAINTIFFS before  
23 Jennifer L. Bush, RPR, Notary Public in and for the State  
24 of Florida at Large, pursuant to Notice of Taking  
25 Deposition in the above cause.

<p style="text-align: right;">Page 2</p> <p>1 A P P E A R A N C E S</p> <p>2 APPEARING ON BEHALF OF THE PLAINTIFFS:</p> <p>3</p> <p>4 Meryl C. Governski, Esquire</p> <p>5 Joanna Lamberta, Esquire</p> <p>6 Aaron Nathan, Esquire</p> <p>7 Willkie Farr &amp; Gallagher LLP</p> <p>8 1875 K Street, NW</p> <p>9 Washington, DC 20006</p> <p>10 202-303-1000</p> <p>11 Mgovernski@willkie.com</p> <p>12</p> <p>13 APPEARING ON BEHALF OF THE DEFENDANTS:</p> <p>14</p> <p>15 Joseph M. Cammarata, Esquire</p> <p>16 Cammarata &amp; DeMeyer PC</p> <p>17 456 Arlene Street</p> <p>18 Staten Island, NY 10314</p> <p>19 718-447-0020</p> <p>20 Joe@cdlawpc.com</p> <p>21 Also Present:</p> <p>22 Chris Gendron, Videographer</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 THE VIDEOGRAPHER: Good afternoon. We're</p> <p>2 going on the record at 4:06 p.m. on December 26,</p> <p>3 2024. Please note the microphones are sensitive</p> <p>4 and may pick up whispering and private</p> <p>5 conversations. Please mute your phones at this</p> <p>6 time. Audio and video recording will continue to</p> <p>7 take place unless all parties agree to go off the</p> <p>8 record.</p> <p>9 This is Media Unit 1 of the video-recorded</p> <p>10 deposition of Alan Placa taken in the matter of</p> <p>11 Ruby Freeman, et al. versus Rudolph W. Giuliani</p> <p>12 taken -- the location of the deposition is West</p> <p>13 Palm Beach Marriott, 1001 Okeechobee Boulevard,</p> <p>14 West Palm Beach Florida.</p> <p>15 My name is Chris Gendron. I'm the</p> <p>16 videographer. The court reporter is Jennifer Bush</p> <p>17 from the firm Veritext Legal Solutions.</p> <p>18 Will counsel please introduce themselves</p> <p>19 and state whom they represent, after which the</p> <p>20 court reporter will please swear in the witness.</p> <p>21 MS. GOVERNSKI: Meryl Governski, Willkie</p> <p>22 Farr &amp; Gallagher, on behalf of plaintiffs.</p> <p>23 MS. LAMBERTA: Joanne Lamberta, Willkie</p> <p>24 Farr &amp; Gallagher, on behalf of plaintiffs.</p> <p>25 MR. NATHAN: Aaron Nathan, Willkie Farr &amp;</p>
<p style="text-align: right;">Page 3</p> <p>1 INDEX OF PROCEEDINGS</p> <p>2</p> <p>3 VIDEO DEPOSITION OF MONSIGNOR ALAN PLACA</p> <p>4 DIRECT EXAMINATION BY MS. GOVERNSKI: 5</p> <p>5</p> <p>6 CERTIFICATE OF NOTARY PUBLIC 92</p> <p>7 ERRATA SHEET 95</p> <p>8 CERTIFICATE OF OATH OF WITNESS 96</p> <p>9 CERTIFICATE OF REPORTER 95</p> <p>10 READ LETTER 94</p> <p>11</p> <p>12 PLACA EXHIBITS</p> <p>13 Number Description Page</p> <p>14 Exhibit 1 Defendant's Second Amended 55</p> <p>15 Disclosures</p> <p>16 Exhibit 2 Witness List 55</p> <p>17 Exhibit 3 Plaintiffs' Notice of Deposition of 62</p> <p>18 Monsignor Alan Placa</p> <p>19 Exhibit 4 LinkedIn Profile 68</p> <p>20 Exhibit 5 BishopAccountability.org Article 76</p> <p>21 Exhibit 6 ABC News Article 10/23/07 82</p> <p>22 Exhibit 7 Federal Election Commission 86</p> <p>23 Individual Contributions</p> <p>24 Exhibit 8 Federal Election Commission 86</p> <p>25 Individual Contributions</p>	<p style="text-align: right;">Page 5</p> <p>1 Gallagher, on behalf of plaintiffs.</p> <p>2 MR. CAMMARATA: Joseph Cammarata on behalf</p> <p>3 of Rudolph W. Giuliani.</p> <p>4 WHEREUPON,</p> <p>5 MONSIGNOR ALAN PLACA,</p> <p>6 called as a witness on behalf of the PLAINTIFFS, after</p> <p>7 having been first duly sworn, was examined and testified</p> <p>8 as follows:</p> <p>9 THE WITNESS: I do so swear.</p> <p>10 DIRECT EXAMINATION</p> <p>11 BY MS. GOVERNSKI:</p> <p>12 Q. Sir, will you please state your full name</p> <p>13 for the record?</p> <p>14 A. Sure, it's Alan, A-L-A-N, Placa, P-L-A-C-A.</p> <p>15 Q. And if I refer to you as Monsignor Placa,</p> <p>16 is that --</p> <p>17 A. That's just fine.</p> <p>18 Q. Okay. Thank you. Monsignor Placa, you are</p> <p>19 here without a lawyer; is that accurate?</p> <p>20 A. That's correct.</p> <p>21 Q. Do you have a lawyer who's representing you</p> <p>22 in this matter?</p> <p>23 A. I don't.</p> <p>24 Q. Mr. Cammarata is present. You understand</p> <p>25 that he is here as the legal representative for the</p>

<p style="text-align: right;">Page 10</p> <p>1 So you just use whatever number is your 2 phone? 3 A. That's exactly right. 4 Q. We'll try not to speak over each other for 5 the court reporter's benefit. 6 Monsignor Placa, do you text message 7 Mr. Giuliani? 8 A. No. 9 Q. Do you email him? 10 A. Sometimes. 11 Q. What email address do you email him at? 12 A. I don't know. 13 Q. Okay. What email do you use to communicate 14 with him? 15 A. My own email is APlaca@aol.com. 16 Q. An AOL email address. Do you ever email 17 Mr. Giuliani with any other email addresses? 18 A. I don't. 19 Q. And how often would you say you email him 20 as opposed to call him? 21 A. I would say very rarely. 22 Q. And when you speak -- you said you speak to 23 him multiple times a week? 24 A. Usually, yeah. 25 Q. Okay. Are those for long conversations at</p>	<p style="text-align: right;">Page 12</p> <p>1 he tell you he's coming into town? 2 A. Oh, I do know his schedule. I mean, I'd 3 have to look at my emails to see it. But I do know his 4 schedule, so I always know when he's in town. 5 Q. So you referenced your emails. How do your 6 emails help inform what his schedule is? 7 A. I -- I make notes on my -- on my phone -- 8 on my -- on the emails on my phone so that I know when 9 he'll be here and when I had the opportunity to see him. 10 Q. I understand. So you have a calender or 11 something -- 12 A. Exactly right. 13 Q. So -- where you put in when you know he's 14 coming. 15 And usually he'll call you and say, I'm 16 heading into town on X date, and you'll input that into 17 your calendar? 18 A. Yes. 19 Q. Okay. And you bought a place in Palm Beach 20 in August 2013; is that right? 21 A. Sounds right. 22 Q. Okay. Did you buy it as a vacation home? 23 A. No, I moved here then. 24 Q. Okay. 25 A. Yeah.</p>
<p style="text-align: right;">Page 11</p> <p>1 a time? 2 A. Very short. 3 Q. Okay. What do you usually speak with him 4 about? 5 A. It's usually to set up an appointment to 6 meet with one another for lunch or for me to go to his 7 apartment. 8 Q. Okay. And do you know when Mr. Giuliani 9 will be in West Palm Beach in advance? 10 A. Oh, yes. 11 Q. How do you know that? 12 A. He'll tell me, I'll be down. Often enough. 13 See, I live with another retired priest who has had two 14 strokes. So setting things up becomes more complicated 15 because I have to see that he's taken care of in order to 16 leave. 17 Q. So -- so Mr. Giuliani gives you a heads-up 18 exactly when he'll be in town? 19 A. Exactly. 20 Q. And then you can coordinate your outings? 21 A. That's correct. 22 Q. And when he is in town, how often do you 23 see him? 24 A. I would say perhaps twice a month. 25 Q. Okay. And usually how far in advance does</p>	<p style="text-align: right;">Page 13</p> <p>1 Q. So when you moved here, you meant that this 2 was your permanent residence? 3 A. Yes. 4 Q. Okay. And -- and what does it mean to you 5 when you say "you moved here," like -- as opposed to when 6 I asked you, "Is it your vacation home," you said, "No, I 7 moved here," what's the difference between those two in 8 your mind? 9 A. Well, a vacation home, you come back and 10 forth. I -- I -- when I bought the residence here -- 11 actually, let -- let me just be clear about this for 12 myself: 13 When I first bought my first apartment 14 here, I came down for part of the year. But once I 15 bought this house, the house where I live now, I've been 16 a permanent residence. 17 Q. So when you refer to the "first 18 apartment" -- 19 A. Yes. 20 Q. -- was that what you bought in August 2013 21 or is it the current home that you bought in 2013? 22 A. No, it was the apartment. 23 Q. Okay. 24 A. I've been in this house, I believe, for 25 seven years.</p>

<p style="text-align: right;">Page 14</p> <p>1 Q. Okay. So seven years would be 20 -- '19 --</p> <p>2 '18?</p> <p>3 A. Seven -- well --</p> <p>4 Q. 27- -- around 2017.</p> <p>5 A. Well, seven and seven is 14. Yeah.</p> <p>6 Q. I'm a lawyer; I'm not a mathematician,</p> <p>7 obviously.</p> <p>8 Okay. So when you said that you moved</p> <p>9 here, in 2013 did you move here or was it in 2017 that</p> <p>10 you moved here?</p> <p>11 A. I consider my move to be 2017 when I took</p> <p>12 up permanent residence here.</p> <p>13 Q. Okay. And what -- can you explain a little</p> <p>14 bit about that difference.</p> <p>15 Like, during those five years, what -- what</p> <p>16 were -- what was your relationship with the -- with Palm</p> <p>17 Beach between 2013 and when you moved here in 2017?</p> <p>18 MR. CAMMARATA: I'm going to object to the</p> <p>19 form --</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q. Okay.</p> <p>22 MR. CAMMARATA: -- of the question.</p> <p>23 By MS. GOVERNSKI:</p> <p>24 Q. You can answer.</p> <p>25 A. Those -- those first few years, I</p>	<p style="text-align: right;">Page 16</p> <p>1 A. Yes, and because -- and then I had a friend</p> <p>2 nearby.</p> <p>3 Q. And how often -- do you still own homes in</p> <p>4 other places?</p> <p>5 A. I don't.</p> <p>6 Q. Okay. Do you ever leave Palm Beach?</p> <p>7 A. I haven't been out of Palm Beach in seven</p> <p>8 years.</p> <p>9 Q. Okay. And you had mentioned -- oh, when we</p> <p>10 refer to Mr. Giuliani's condo, will you understand I am</p> <p>11 referring to the condo he owns on South Lake Drive?</p> <p>12 A. Indeed.</p> <p>13 Q. You referred to -- you said earlier that</p> <p>14 you've been to his condo.</p> <p>15 Is -- is that the condo you are referring</p> <p>16 to?</p> <p>17 A. Yes, indeed.</p> <p>18 Q. Okay.</p> <p>19 A. Yes.</p> <p>20 Q. So if I refer to "condo," you'll understand</p> <p>21 that's what I'm talking about.</p> <p>22 A. Mm-hmm.</p> <p>23 Q. So let's go back to when you -- the years</p> <p>24 between 2013 and 2017 when you were only here as a</p> <p>25 snowbird in the -- in the winter months.</p>
<p style="text-align: right;">Page 15</p> <p>1 maintained my home in New York and I came here for part</p> <p>2 of the year.</p> <p>3 Q. How often did you come here?</p> <p>4 A. I would say I came once a year and stayed</p> <p>5 for several months.</p> <p>6 Q. And -- and about when would you come?</p> <p>7 A. When the weather got cold in New York.</p> <p>8 Q. Kind of what they call a "snowbird"?</p> <p>9 A. Exactly.</p> <p>10 Q. So like in the winter months --</p> <p>11 A. Yes.</p> <p>12 Q. -- you would come here for an extended</p> <p>13 period of time. Is that right?</p> <p>14 A. Yes.</p> <p>15 Q. And then in 2017 is when you started to not</p> <p>16 go back and forth?</p> <p>17 A. That's right.</p> <p>18 Q. Okay. And what prompted you to relocate</p> <p>19 here to Palm Beach in 2017?</p> <p>20 A. I liked it.</p> <p>21 Q. And Mr. Giuliani at that point had an</p> <p>22 apartment in Palm Beach, right?</p> <p>23 A. He did.</p> <p>24 Q. Did that influence your decision to move</p> <p>25 here?</p>	<p style="text-align: right;">Page 17</p> <p>1 Did you have personal knowledge about how</p> <p>2 much -- how often Mr. Giuliani was in Palm Beach during</p> <p>3 those years?</p> <p>4 A. If I did, I've forgotten.</p> <p>5 Q. Okay. So you don't have any personal</p> <p>6 knowledge about the period in time before 2017?</p> <p>7 A. Not in my memory, no.</p> <p>8 Q. Okay. And -- so what is your earliest date</p> <p>9 that you can recall -- scratch that.</p> <p>10 We talked about whether you had personal</p> <p>11 knowledge of Mr. Giuliani's time in Palm Beach between</p> <p>12 2013 and 2017 and you said, "not in your memory."</p> <p>13 So when is the earliest time period when</p> <p>14 you have personal knowledge about Mr. Giuliani's</p> <p>15 relationship with Palm Beach?</p> <p>16 MR. CAMMARATA: I'm going to object to the</p> <p>17 form.</p> <p>18 BY MS. GOVERNSKI:</p> <p>19 Q. You can answer.</p> <p>20 A. When I moved here myself.</p> <p>21 Q. 2017?</p> <p>22 A. Right.</p> <p>23 Q. Okay. So let's go back to just 2017,</p> <p>24 around that time.</p> <p>25 What is your recollection of how</p>

<p style="text-align: right;">Page 18</p> <p>1 Mr. Giuliani used his Palm Beach condo at that point?</p> <p>2 A. My recollection is that he used it quite</p> <p>3 regularly and I visited him there quite regularly.</p> <p>4 Q. What does "quite regularly" mean to you?</p> <p>5 A. I would visit him there, I would say,</p> <p>6 several times a month, three times a month.</p> <p>7 Q. Three times a month.</p> <p>8 During which months?</p> <p>9 A. The months when I was here.</p> <p>10 Q. But in -- I'm sorry, I thought we were</p> <p>11 talking about in 2017 when you were here all the time.</p> <p>12 A. Oh, yes. Oh, then I -- if we're talking</p> <p>13 about that period of time, then I would see him quite</p> <p>14 regularly, meaning a couple of times a month -- and what</p> <p>15 was the question?</p> <p>16 Q. Let's start -- let's go -- let's go back</p> <p>17 if -- if -- I think we're confusing dates and I just want</p> <p>18 to make sure --</p> <p>19 A. Okay.</p> <p>20 Q. -- we're both on the same page.</p> <p>21 A. Uh-huh.</p> <p>22 Q. So during the period of time between 2013</p> <p>23 and 2017, when you were not living here full time --</p> <p>24 A. Uh-huh.</p> <p>25 Q. -- do you have any personal knowledge about</p>	<p style="text-align: right;">Page 20</p> <p>1 from 2017 forward which is when you were here all the</p> <p>2 time, right?</p> <p>3 A. Uh-huh.</p> <p>4 Q. Okay. So what is your recollection --</p> <p>5 let's go back right around 2017, right around when you</p> <p>6 bought your current residence, okay?</p> <p>7 A. Uh-huh.</p> <p>8 Q. During that time, those early years, how</p> <p>9 often would you see Mr. Giuliani in Palm Beach?</p> <p>10 MR. CAMMARATA: Objection to the form.</p> <p>11 THE WITNESS: I would say I'd see him,</p> <p>12 perhaps, three times a month.</p> <p>13 BY MS. GOVERNSKI:</p> <p>14 Q. During what months?</p> <p>15 A. During what months?</p> <p>16 Q. Yeah, so in 2017 when you were living</p> <p>17 here --</p> <p>18 A. Right.</p> <p>19 Q. -- year around, would you see him three</p> <p>20 times a month every month of the year?</p> <p>21 A. Yes.</p> <p>22 Q. So he -- Mr. Giuliani was in Palm Beach</p> <p>23 every month of the year --</p> <p>24 A. No, no.</p> <p>25 Q. -- in 2017?</p>
<p style="text-align: right;">Page 19</p> <p>1 how often Mr. Giuliani was here in Palm Beach?</p> <p>2 A. I have no memory of it. No.</p> <p>3 Q. You have no memory of that?</p> <p>4 A. Right.</p> <p>5 Q. So when you talked about seeing him when</p> <p>6 you were in town, what was that in reference to? Because</p> <p>7 you -- you had said well, when I saw him, "when I was in</p> <p>8 town, I would see him."</p> <p>9 But you were in town all the time after</p> <p>10 2017 --</p> <p>11 A. That's correct.</p> <p>12 Q. -- so I'm just trying to understand that</p> <p>13 testimony.</p> <p>14 A. What don't you understand? I'm sorry.</p> <p>15 Q. Okay. So the period before 2017 --</p> <p>16 A. Uh-huh.</p> <p>17 Q. -- you were here seasonally?</p> <p>18 A. Right.</p> <p>19 Q. And it's your testimony that you have no</p> <p>20 recollection about how often Mr. Giuliani was here prior</p> <p>21 to --</p> <p>22 A. I don't --</p> <p>23 Q. -- 2017?</p> <p>24 A. -- remember. Right.</p> <p>25 Q. Okay. So I'm going to ask you questions</p>	<p style="text-align: right;">Page 21</p> <p>1 A. I'm sorry. No, I'm sorry. He was not.</p> <p>2 So I would see him and I can't tell you</p> <p>3 which months because I don't remember his schedule, but I</p> <p>4 would see him -- when he was here, when he was in Palm</p> <p>5 Beach, I would see him about three times a month.</p> <p>6 Q. Okay. What is the best of your</p> <p>7 recollection in those 2017 early years about how many</p> <p>8 times a year he was here in Palm Beach?</p> <p>9 A. I don't remember.</p> <p>10 Q. What about, let's say, 2019, right before</p> <p>11 COVID. Do you have any recollection about -- about that</p> <p>12 year and how often you saw Mr. Giuliani in Palm Beach?</p> <p>13 A. Not specifically, no.</p> <p>14 Q. Okay. So you have no recollection about</p> <p>15 the year 2019 --</p> <p>16 A. No.</p> <p>17 Q. -- and how often Mr. Giuliani was here?</p> <p>18 A. I don't.</p> <p>19 Q. Okay. Over the years, do you recall</p> <p>20 celebrating Mr. Giuliani's birthday with him?</p> <p>21 A. Sure.</p> <p>22 Q. His birthday is in May, right?</p> <p>23 A. In May.</p> <p>24 Q. Okay. And where did you celebrate his</p> <p>25 birthday?</p>

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<p style="text-align: right;">Page 22</p> <p>1 A. Usually in a restaurant.</p> <p>2 Q. In Palm Beach?</p> <p>3 A. Yes.</p> <p>4 Q. Was he often in Palm Beach on his birthday?</p> <p>5 A. Yes, often. Not always but often.</p> <p>6 Q. Okay. Do you have any specific</p> <p>7 recollections of any birthday parties in Palm Beach that</p> <p>8 you attended?</p> <p>9 A. No, no.</p> <p>10 Q. Did you ever travel to New York for any of</p> <p>11 his birthday parties?</p> <p>12 A. No.</p> <p>13 Q. Okay. What about Christmas, would he</p> <p>14 celebrate Christmas in Palm Beach?</p> <p>15 A. When he was here, yes.</p> <p>16 Q. Well, so I'm asking. Would he be here for</p> <p>17 Christmas, generally?</p> <p>18 A. I can't -- I don't remember that.</p> <p>19 Q. You don't have any recollection?</p> <p>20 A. No.</p> <p>21 Q. Could you estimate in your experience</p> <p>22 between 20- -- let's say 2017 through 2019, which we've</p> <p>23 talked about; do you have any recollection about how many</p> <p>24 times Mr. Giuliani was in Palm Beach during that time</p> <p>25 period?</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Okay. But not recently?</p> <p>2 A. I've not seen him drive recently.</p> <p>3 Q. Okay. What about social clubs, do you ever</p> <p>4 go to social clubs with him here in Palm Beach?</p> <p>5 A. No.</p> <p>6 Q. What about church, does he go to church on</p> <p>7 -- here on Palm Beach?</p> <p>8 A. Not with me.</p> <p>9 Q. Not with you.</p> <p>10 A. He's often come to mass at my house. We</p> <p>11 have -- again, I live with another retired priest and we</p> <p>12 have mass at home and he's often joined us for mass at</p> <p>13 home.</p> <p>14 Q. And when you say "often joined" you, like</p> <p>15 how -- what does that mean?</p> <p>16 A. I mean I don't know how often it is. It's</p> <p>17 maybe four or five times in my life that he's had mass</p> <p>18 with us.</p> <p>19 Q. And when, around? Around when?</p> <p>20 A. No recollection of that.</p> <p>21 Q. Okay. Recently?</p> <p>22 A. No, not recently, no.</p> <p>23 Q. Okay. When is the -- when is the most</p> <p>24 recent time you've been at his condo?</p> <p>25 A. I'd say in the last three months I've been</p>
<p style="text-align: right;">Page 23</p> <p>1 A. No.</p> <p>2 Q. Okay. What do you do when he -- when he's</p> <p>3 here? You said you see him three times a month. What do</p> <p>4 you do with him?</p> <p>5 A. Sit, talk, smoke cigars and drink single</p> <p>6 malt Scotch.</p> <p>7 Q. In his condo for the most part?</p> <p>8 A. Yes, often enough.</p> <p>9 Q. Do you ever do any activities outside of</p> <p>10 the condo?</p> <p>11 A. We go to a restaurant occasionally, but</p> <p>12 usually we visit at his house.</p> <p>13 Q. Okay. And usually you go to him?</p> <p>14 A. Yes, that's right.</p> <p>15 Q. Does he ever come to you?</p> <p>16 A. He's come to my house once or twice, yeah.</p> <p>17 Q. Does he drive to you?</p> <p>18 A. I think he has a driver.</p> <p>19 Q. Have you ever seen him drive?</p> <p>20 A. No.</p> <p>21 Q. Do you know if he drives?</p> <p>22 A. I don't know that.</p> <p>23 Q. Okay. And over the course of your</p> <p>24 friendship, has he ever driven?</p> <p>25 A. Oh, sure.</p>	<p style="text-align: right;">Page 25</p> <p>1 there and more than once.</p> <p>2 Q. Okay. Let's talk about that.</p> <p>3 A. Okay.</p> <p>4 Q. So the last three months, it's December</p> <p>5 now. So let's say September -- well, you tell me. So</p> <p>6 when do you recall being there in the last three months?</p> <p>7 A. Well, I was there -- we're now in December.</p> <p>8 I would say I was there in October. And also in</p> <p>9 November.</p> <p>10 Q. Okay. So you were there in October and</p> <p>11 November. What about before then? When is -- when is</p> <p>12 the last time you were there -- were you there at all</p> <p>13 earlier this year?</p> <p>14 A. Oh, yes.</p> <p>15 Q. When else? Let's talk about 2024. When</p> <p>16 else were you at his condo in Florida?</p> <p>17 A. I don't recollect any specific dates when</p> <p>18 you say that, but I certainly was there in October and in</p> <p>19 November.</p> <p>20 Q. Okay. Can you recall any other dates this</p> <p>21 year --</p> <p>22 A. No.</p> <p>23 Q. -- you were there? What about in 2023, can</p> <p>24 you recall any times that you were there in 2023?</p> <p>25 A. Yes, I mean, I can recall times. I can't</p>

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<p style="text-align: right;">Page 30</p> <p>1 A. I do.</p> <p>2 Q. Tell me about what you recall about those</p> <p>3 conversations.</p> <p>4 A. Nothing.</p> <p>5 Q. You have no recollection?</p> <p>6 A. No.</p> <p>7 Q. So what about those conversations led you</p> <p>8 to believe that he intended to establish Palm Beach as</p> <p>9 his home beginning in early 2023?</p> <p>10 A. He told me that was his intention. Again,</p> <p>11 I don't travel because of my situation and the priest I</p> <p>12 live with. I haven't been up to New York in at least</p> <p>13 seven years. So, I mean, I've lost my way. But he -- I</p> <p>14 knew that he -- I knew that he was moving down.</p> <p>15 Q. And how certain are you that you had those</p> <p>16 conversations in early 2023?</p> <p>17 A. Oh, I'm certain that we discussed this in</p> <p>18 early 2023, yeah.</p> <p>19 Q. Do you have any certainty about when in</p> <p>20 early 2023?</p> <p>21 A. No. I'm sorry, no.</p> <p>22 Q. Okay. Do you recall where you were when</p> <p>23 you had those conversations?</p> <p>24 A. No.</p> <p>25 Q. Was it over the phone or in person?</p>	<p style="text-align: right;">Page 32</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q. Monsignor Placa, focusing just on 2023 --</p> <p>3 A. Okay.</p> <p>4 Q. -- how often do you recall seeing him here</p> <p>5 once he had decided to make Palm Beach his home?</p> <p>6 A. I think about twice a month.</p> <p>7 Q. So twice a month throughout 2023?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. So probably that's about 24 times,</p> <p>10 give or take, in 2023. Is that right?</p> <p>11 A. Yes, that's correct.</p> <p>12 Q. Do you recall whether he celebrated his</p> <p>13 birthday here in 2023?</p> <p>14 A. I don't.</p> <p>15 Q. Okay. What about Christmas last year, do</p> <p>16 you recall if he was here for Christmas last year?</p> <p>17 A. I don't think he was, no.</p> <p>18 Q. Okay. Do you have any specific memories</p> <p>19 of -- of time that you spent with him in 2023 in Palm</p> <p>20 Beach?</p> <p>21 A. Yes.</p> <p>22 Q. Can you tell me about them?</p> <p>23 A. What would you like me to tell you? We</p> <p>24 visit. Again, we've been friends since 9th grade, which</p> <p>25 I promise you, is a long time ago but -- and so we catch</p>
<p style="text-align: right;">Page 31</p> <p>1 A. Sometimes over the phone, often in person.</p> <p>2 Q. You said that he told you that he intended</p> <p>3 to live in Palm Beach. What do you recall about what he</p> <p>4 exactly told you?</p> <p>5 A. That he would be moving out of his New York</p> <p>6 apartment and coming to live full time in the Palm Beach</p> <p>7 apartment.</p> <p>8 Q. And in your personal experience, has that</p> <p>9 occurred, has he moved out of his New York apartment and</p> <p>10 started coming to live full time in Palm Beach beginning</p> <p>11 in early 2023?</p> <p>12 MR. CAMMARATA: Objection to the form.</p> <p>13 THE WITNESS: That's my understanding,</p> <p>14 that -- my recollection is that he -- again, I</p> <p>15 don't know the situation of his New York</p> <p>16 apartment. I don't know if he even still owns it.</p> <p>17 I don't know that. But I do know that in early</p> <p>18 2023, he was on his -- he was moving here.</p> <p>19 BY MS. GOVERNSKI:</p> <p>20 Q. And you are certain about that that</p> <p>21 conversation occurred in 2023?</p> <p>22 MR. CAMMARATA: Objection, asked and</p> <p>23 answered.</p> <p>24 THE WITNESS: Yes.</p> <p>25</p>	<p style="text-align: right;">Page 33</p> <p>1 up on old times. We talk about the family, his family</p> <p>2 and mine.</p> <p>3 You asked about Christmas. You see -- I</p> <p>4 think most years for holidays like Thanksgiving or</p> <p>5 Christmas, he's up in New Hampshire and then I see him</p> <p>6 when he's down here.</p> <p>7 Q. So when you say "most years," I mean, how</p> <p>8 far back has that been that's he's been having</p> <p>9 Thanksgiving, Christmas in New Hampshire?</p> <p>10 A. I couldn't say, I'm sorry. And that's --</p> <p>11 the problem is my recollection. I just don't recall.</p> <p>12 Q. But at least the last few years?</p> <p>13 A. Oh, yes, absolutely.</p> <p>14 Q. Okay. Certainly in 2023?</p> <p>15 A. Oh, absolutely.</p> <p>16 Q. Okay. Maybe in 2022, do you have any</p> <p>17 recollection?</p> <p>18 MR. CAMMARATA: Objection to form.</p> <p>19 THE WITNESS: Not a specific recollection.</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q. And going back to, about your two dozen</p> <p>22 meetings in 2023, were most of those in his Florida</p> <p>23 condo?</p> <p>24 A. Yes, indeed.</p> <p>25 Q. Do you have any recollection of any times</p>



<p style="text-align: right;">Page 34</p> <p>1 that you spent with Mr. Giuliani in 2023 outside of his 2 Palm Beach condo?</p> <p>3 A. I have a vague recollection of being, at 4 least once or twice, in restaurants with him. We often 5 do that but it's a vague recollection.</p> <p>6 Q. Okay. So as between 2023 and this year, 7 2024, has anything changed about the way that 8 Mr. Giuliani has used his Florida condo?</p> <p>9 MR. CAMMARATA: Objection to the form.</p> <p>10 THE WITNESS: I think he's lived here 11 pretty much full time, certainly in this year. 12 I'm not sure just when in 2023 it became his 13 full-time residence but it did at some point.</p> <p>14 BY MS. GOVERNSKI:</p> <p>15 Q. So between 2023 and 2024, can you recall 16 any specific differences between how he's used the 17 Florida condo?</p> <p>18 A. No.</p> <p>19 Q. How -- does he host his kids in his Palm 20 Beach condo, his kids?</p> <p>21 MR. CAMMARATA: Objection to the form.</p> <p>22 THE WITNESS: I think that -- I believe 23 that Andrew has visited. I don't believe Caroline 24 has visited. 25</p>	<p style="text-align: right;">Page 36</p> <p>1 that it was -- usually twice a month, that would be a 2 normal frequency.</p> <p>3 Q. Okay. So if you wanted to know, would you 4 be able to consult your calendar?</p> <p>5 A. I would be able to.</p> <p>6 Q. Okay. But you did not consult your 7 calendar in advance of this deposition, right?</p> <p>8 A. No, I did not.</p> <p>9 Q. Okay. And are you aware of how many times 10 Mr. Giuliani was physically present in Palm Beach this 11 year?</p> <p>12 MR. CAMMARATA: Objection to the form.</p> <p>13 THE WITNESS: As far as I know, he's lived 14 here this year. This has been his home.</p> <p>15 BY MS. GOVERNSKI:</p> <p>16 Q. And what is -- and what is that specific 17 knowledge based on --</p> <p>18 MR. CAMMARATA: I'm --</p> <p>19 BY MS. GOVERNSKI:</p> <p>20 Q. -- regarding this year?</p> <p>21 MR. CAMMARATA: I'm going to object. This 22 question has been asked and answered multiple 23 times. 24 BY MS. GOVERNSKI: 25 Q. You can answer.</p>
<p style="text-align: right;">Page 35</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q. How often has Andrew visited?</p> <p>3 A. I couldn't say.</p> <p>4 Q. Okay. Does he have parties at his Palm 5 Beach condo?</p> <p>6 A. If he does, I'm not invited.</p> <p>7 Q. And -- so you've mentioned, we have talked 8 a lot about 2023 and that you recall about two dozen 9 times that you've interacted with him mostly at his 10 Florida condo. So now I want to focus on 2024.</p> <p>11 A. Okay.</p> <p>12 Q. Okay.</p> <p>13 You have mentioned that you spent time with 14 him in October and November of this year in his condo. I 15 want to talk to you about those specific times. But do 16 you recall any other visits with him in 2024?</p> <p>17 A. Other than...</p> <p>18 Q. Other than the two that we've talked about 19 or that you've mentioned, October and November of 2024.</p> <p>20 A. I don't remember any specific time. I 21 certainly have had other visits with him but I don't 22 remember any specifically.</p> <p>23 Q. And about how many times do you recall 24 seeing Mr. Giuliani in person in West Palm Beach in 2024?</p> <p>25 A. Oh. I don't keep count but I would expect</p>	<p style="text-align: right;">Page 37</p> <p>1 A. Repeat the question, please.</p> <p>2 Q. Sure. I'm asking you specifically about 3 2024.</p> <p>4 A. Right.</p> <p>5 Q. What is your knowledge of his spending 2024 6 in Palm Beach based upon?</p> <p>7 A. Conversations with him and visits, visits 8 to the condo -- visits I've made to his condo with him.</p> <p>9 Q. So let's talk about 2024. Are you aware of 10 whether Mr. Giuliani -- well, let's start as recently as 11 this month.</p> <p>12 Did Mr. Giuliani spend Christmas in Palm 13 Beach this year?</p> <p>14 A. No.</p> <p>15 Q. Where was he for Christmas?</p> <p>16 A. He would have been New Hampshire.</p> <p>17 Q. Because he's in New Hampshire every 18 Christmas?</p> <p>19 MR. CAMMARATA: Objection to the form. 20 Asked and answered. He's answered this question 21 four times already.</p> <p>22 MS. GOVERNSKI: You can state your 23 objection.</p> <p>24 MR. CAMMARATA: And that's fine.</p> <p>25 MS. GOVERNSKI: And move on.</p>

<p style="text-align: right;">Page 38</p> <p>1 MR. CAMMARATA: But your -- it's now 2 getting to the point where it's badgering. 3 MS. GOVERNSKI: Joe, you are not listening 4 to the question. 5 MR. CAMMARATA: You keep asking the same 6 questions. 7 MS. GOVERNSKI: We're -- I'm asking about 8 2024. You can object -- 9 (Simultaneously speaking.) 10 MR. CAMMARATA: He's answered -- 11 MS. GOVERNSKI: -- and stop speaking 12 objections. 13 MR. CAMMARATA: He's answered it multiple 14 times. 15 BY MS. GOVERNSKI: 16 Q. Monsignor Placa, I'm asking you about 17 December of 2024. 18 A. Yeah. 19 Q. You said he was not here for Christmas, he 20 was in New Hampshire. And my answer was that, "it's 21 because he spends most Christmases in New Hampshire," 22 right? 23 A. I mean, I don't know what "most" means. In 24 the last few years, he has been there. 25 Q. Okay. And was he here for Thanksgiving?</p>	<p style="text-align: right;">Page 40</p> <p>1 A. My visits are usually are a couple of 2 hours. 3 Q. And what did you talk about? 4 A. God knows. Honestly, you know, we've been 5 friends so long, it would be hard to remember any 6 specific conversation. 7 Q. Did you have any conversations with him 8 about this lawsuit? 9 A. I'm sorry? 10 Q. Did you have any conversations with him 11 about this lawsuit? 12 A. No, not at all. 13 Q. Did you have any conversations with him 14 about his intention to declare Palm Beach his permanent 15 residence? 16 A. I'm not sure what "declare" means. I mean, 17 he's made it his permanent residence. I'm not sure how 18 you declare that. 19 Q. In that November meeting at his condo, did 20 you talk about his -- 21 MR. CAMMARATA: Objection to the form 22 November when? 23 MS. GOVERNSKI: You didn't let me finish my 24 question. Let me finish speaking. 25 MR. CAMMARATA: Yeah, I know but you're --</p>
<p style="text-align: right;">Page 39</p> <p>1 A. No. 2 Q. Okay. So what -- so is the last time you 3 saw him in November, here? 4 A. Yes. 5 Q. When was that? 6 A. I'm sorry, I don't remember. 7 Q. Before Thanksgiving? 8 A. No, I've seen him since Thanksgiving. 9 Q. So was he here between Thanksgiving and 10 Christmas? 11 A. Yes. 12 Q. Okay. So let's talk about that. 13 Around when do you recall seeing him in 14 November? 15 A. Around -- around November. 16 Q. Okay. After Thanksgiving? 17 A. Yes. 18 Q. Okay. And what do you -- you went to his 19 apartment -- 20 A. Yes. 21 Q. -- his condo? 22 What do you recall about that visit? 23 A. Nothing. I mean, nothing -- nothing 24 specific. 25 Q. How long were you there for?</p>	<p style="text-align: right;">Page 41</p> <p>1 you're -- 2 MS. GOVERNSKI: Let me finish speaking. 3 (Simultaneously speaking.) 4 MR. CAMMARATA: Okay. 5 BY MS. GOVERNSKI: 6 Q. Monsignor Placa, in that November meeting 7 at his condominium in the beginning of this year or last 8 month, did you talk with Mr. Giuliani about his intent to 9 make Palm Beach his permanent residence? 10 A. You are talking about last month? 11 Q. Last month. 12 A. I think it was his permanent -- my 13 understanding was it was his permanent residence already 14 last month. 15 Q. Okay. So my understanding, from your 16 answer, is that you wouldn't have talked to him about 17 that -- 18 A. Yes. 19 Q. -- in November because it already happened? 20 A. Yeah, it's a given fact. 21 Q. And so those conversations, when you 22 referenced his intent to make Palm Beach his permanent 23 residence, would have occurred in 2023? 24 A. I'm not sure that I -- that I said 25 anybody's intent to make Palm Beach his residence. I</p>

<p style="text-align: right;">Page 42</p> <p>1 mean, it was -- it became his residence. He had the</p> <p>2 apartment for a long time and then it became his</p> <p>3 permanent home.</p> <p>4 Q. In 2023?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. So we talked about November.</p> <p>7 You recall having a meeting with him in his</p> <p>8 Palm Beach condo in October of 2024; is that right?</p> <p>9 A. I do.</p> <p>10 Q. What do you recall about that meeting?</p> <p>11 A. I mean, nothing in particular. It was a</p> <p>12 meeting between old friends and I don't recall anything</p> <p>13 in particular.</p> <p>14 Q. Any conversations about this lawsuit?</p> <p>15 A. No, no. I didn't even know about this</p> <p>16 lawsuit, by the way, until very recently.</p> <p>17 Q. Okay. Any conversations with him about</p> <p>18 Palm Beach being his permanent residence in October 2024?</p> <p>19 A. We had no conversations about that. It</p> <p>20 just was a fact. It's a fact of life.</p> <p>21 Q. Okay. So you -- you mentioned that you see</p> <p>22 him about two times -- saw him about two times a month in</p> <p>23 2024. Do you have any recollection of any other meetings</p> <p>24 with Mr. Giuliani in person throughout 2024, other than</p> <p>25 the two that we've discussed?</p>	<p style="text-align: right;">Page 44</p> <p>1 present in Palm Beach in 2024?</p> <p>2 MR. CAMMARATA: Objection to the form.</p> <p>3 THE WITNESS: To my recollection, he lived</p> <p>4 here in 2024. So I don't have any specific</p> <p>5 recollection of him being here, apart from his</p> <p>6 visits with friends in New Hampshire which is</p> <p>7 occasions, Christmas, Thanksgiving. Apart from</p> <p>8 that, he's lived here the whole year as far as I</p> <p>9 know.</p> <p>10 BY MS. GOVERNSKI:</p> <p>11 Q. So you understand that Mr. Giuliani travels</p> <p>12 often?</p> <p>13 A. Oh, sure.</p> <p>14 Q. Okay. Do you have personal knowledge about</p> <p>15 his travel calendar?</p> <p>16 A. No, I don't.</p> <p>17 Q. So do you have any understanding of when</p> <p>18 he's physically in Palm Beach versus when he's on trips</p> <p>19 elsewhere?</p> <p>20 A. No, no.</p> <p>21 Q. So you would have no personal knowledge</p> <p>22 about how many days he has physically been in Palm Beach</p> <p>23 in 2024?</p> <p>24 A. It's his home. So I don't know -- I mean,</p> <p>25 listen. I've known him for a long time. He's always</p>
<p style="text-align: right;">Page 43</p> <p>1 MR. CAMMARATA: Objection to the form.</p> <p>2 THE WITNESS: I didn't understand</p> <p>3 the question at all.</p> <p>4 BY MS. GOVERNSKI:</p> <p>5 Q. Sure. We talked about two in-person visits</p> <p>6 that you had with Mr. Giuliani in 2024 in October and</p> <p>7 November, right?</p> <p>8 A. In October, yeah.</p> <p>9 Q. Right. Are there any other in-person</p> <p>10 visits in 2024 that you recall with any specificity?</p> <p>11 A. No.</p> <p>12 Q. Any conversations in all of 2024 where you</p> <p>13 discussed his intent to make Palm Beach his permanent</p> <p>14 residence?</p> <p>15 MR. CAMMARATA: Objection to the form, and</p> <p>16 objection, it was asked and answered.</p> <p>17 THE WITNESS: I don't remember any specific</p> <p>18 conversations about his intending to do it. It</p> <p>19 became a fact.</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q. Do you recall having any conversations with</p> <p>22 him in 2024 about the fact that he lived in Palm Beach?</p> <p>23 A. No.</p> <p>24 Q. How often -- do you have any personal</p> <p>25 knowledge about how often Mr. Giuliani was physically</p>	<p style="text-align: right;">Page 45</p> <p>1 traveled a lot. That never changed my understanding</p> <p>2 where his home was. He just travels because of the</p> <p>3 nature of his business.</p> <p>4 Q. Right. So I'm just trying to understand if</p> <p>5 you have knowledge of how many days of 2024 he's</p> <p>6 physically been in Palm Beach as opposed to traveling in</p> <p>7 the course of his work?</p> <p>8 A. I don't. I don't.</p> <p>9 Q. And what about for 2023?</p> <p>10 A. Neither.</p> <p>11 Q. But in your opinion, the number of days</p> <p>12 he's spent in Palm Beach in 2023 and 2024 was roughly</p> <p>13 equivalent?</p> <p>14 A. To each other you mean? Yes.</p> <p>15 Q. Okay. Mr. Giuliani has admitted that he</p> <p>16 did not occupy the Palm Beach condo any time between</p> <p>17 June 17th and August 8, 2024. Do you have any reason to</p> <p>18 dispute that?</p> <p>19 A. No.</p> <p>20 Q. Do you recall seeing him here in the summer</p> <p>21 of 2024?</p> <p>22 A. Not specifically, no.</p> <p>23 Q. Do you know whether he was here in the</p> <p>24 summer of 2024?</p> <p>25 A. I have no specific recollection, no.</p>

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<p style="text-align: right;">Page 46</p> <p>1 Q. So you wouldn't know one way or the other?</p> <p>2 A. No.</p> <p>3 Q. The summer of 2024 was around the time of</p> <p>4 the Republican National Convention. Do you recall that?</p> <p>5 A. I remember the convention.</p> <p>6 Q. Do you recall whether he was in Palm Beach</p> <p>7 any time before or after the RNC?</p> <p>8 A. As far as I know, he was here both before</p> <p>9 and before the convention.</p> <p>10 Q. Okay. But we just talked about that</p> <p>11 Mr. Giuliani has admitted that he did not occupy the Palm</p> <p>12 Beach condo any time between June 17, 2024, and</p> <p>13 August 29, 2024. Do you have any reason to dispute that?</p> <p>14 A. No.</p> <p>15 Q. Okay. So when you said that you recall him</p> <p>16 being in Palm Beach before or after the RNC, what is that</p> <p>17 based on?</p> <p>18 A. My own recollection of where he was.</p> <p>19 Again, I don't keep tabs on him, which would be quite an</p> <p>20 operation, by the way. But that's my own recollection.</p> <p>21 Q. And so it's your testimony that</p> <p>22 Mr. Giuliani would know about his whereabouts more than</p> <p>23 you would?</p> <p>24 A. He sure would.</p> <p>25 Q. Okay. So you said you've been in his</p>	<p style="text-align: right;">Page 48</p> <p>1 A. I just know that.</p> <p>2 Q. How big of a fan of Joe DiMaggio is</p> <p>3 Mr. Giuliani?</p> <p>4 A. I don't even know how to answer the</p> <p>5 question, I'm sorry.</p> <p>6 Q. Okay. Are you aware that Mr. Giuliani owns</p> <p>7 a signed Joe DiMaggio shirt?</p> <p>8 A. Yes, in fact, I do know that, yeah.</p> <p>9 Q. How do you know that?</p> <p>10 A. He's shown it to me and I've heard him</p> <p>11 speak about it.</p> <p>12 Q. When -- when has he shown it to you?</p> <p>13 A. Oh, God, I don't remember.</p> <p>14 Q. Why do you recall him showing it to you,</p> <p>15 what -- what makes it stick out in your memory?</p> <p>16 A. I'd never seen a Joe DiMaggio shirt before</p> <p>17 or since.</p> <p>18 Q. Do you have any recollection of around when</p> <p>19 that was?</p> <p>20 A. No.</p> <p>21 Q. Where were you when he showed it to you?</p> <p>22 A. At his home.</p> <p>23 Q. What home?</p> <p>24 A. At the apartment -- actually, it was here</p> <p>25 in Florida.</p>
<p style="text-align: right;">Page 47</p> <p>1 condominium about two dozen times in 2023 and about two</p> <p>2 dozen times in 2024?</p> <p>3 A. Roughly.</p> <p>4 Q. Have you noticed any differences in his</p> <p>5 Florida condo between those two years?</p> <p>6 A. I'm not very observant about such things,</p> <p>7 I'm sorry.</p> <p>8 Q. Have you noticed him moving any new</p> <p>9 furniture in or out?</p> <p>10 A. No.</p> <p>11 Q. Do you know if he keeps items of</p> <p>12 sentimental value in his Florida condo?</p> <p>13 A. Not specifically, no.</p> <p>14 MR. CAMMARATA: Objection to the form.</p> <p>15 BY MS. GOVERNSKI:</p> <p>16 Q. What about -- you are aware that</p> <p>17 Mr. Giuliani is a sports fan, right?</p> <p>18 A. I sure am.</p> <p>19 Q. What are his favorite teams?</p> <p>20 A. New York Yankees.</p> <p>21 Q. Who is his favorite Yankee player?</p> <p>22 A. I'm sorry, I don't know.</p> <p>23 Q. Was he a fan of Joe DiMaggio?</p> <p>24 A. Oh, he sure was, yeah.</p> <p>25 Q. How do you know that?</p>	<p style="text-align: right;">Page 49</p> <p>1 Q. It was here in Florida?</p> <p>2 A. Yeah.</p> <p>3 Q. Did he keep it here in Florida?</p> <p>4 A. I can't answer that. I don't know what</p> <p>5 "keep it" means. That's certainly where I saw it.</p> <p>6 Q. You saw it here in Florida. Can you</p> <p>7 ballpark what year that might have been?</p> <p>8 A. No.</p> <p>9 Q. This past year?</p> <p>10 MR. CAMMARATA: Objection. He answered the</p> <p>11 question.</p> <p>12 THE WITNESS: Certainly within the last two</p> <p>13 years.</p> <p>14 BY MS. GOVERNSKI:</p> <p>15 Q. Within the last two years you've seen the</p> <p>16 Joe DiMaggio shirt here in Florida?</p> <p>17 A. That's right.</p> <p>18 Q. Is it framed, by the way?</p> <p>19 A. It was, yeah, when I saw it, yeah.</p> <p>20 Q. When you saw it, it was framed?</p> <p>21 A. Uh-huh.</p> <p>22 Q. Was it hanging on a wall?</p> <p>23 A. I believe it was, yeah.</p> <p>24 Q. In the Florida condo?</p> <p>25 A. That's my recollection.</p>

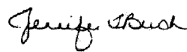
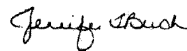
<p style="text-align: right;">Page 58</p> <p>1 along. I -- I've visited him here and...</p> <p>2 Q. Do you have any other information about</p> <p>3 these topics that we haven't already discussed today?</p> <p>4 A. No.</p> <p>5 Q. We have exhausted all of your knowledge</p> <p>6 about those topics?</p> <p>7 A. Totally exhausted.</p> <p>8 Q. Totally exhausted.</p> <p>9 Okay. So let's go to the next Placa</p> <p>10 Deposition Exhibit 2.</p> <p>11 And you will see -- are you with me --</p> <p>12 A. I am.</p> <p>13 Q. -- Monsignor Placa? Great.</p> <p>14 It -- under -- on page 1, it states,</p> <p>15 "Witnesses."</p> <p>16 A. Uh-huh.</p> <p>17 Q. And it says, "Defendant provides the</p> <p>18 following list of potential trial witnesses for this</p> <p>19 case-in-chief."</p> <p>20 Do you see that?</p> <p>21 A. I do.</p> <p>22 Q. Okay. If you can turn to the next page.</p> <p>23 You see that you are the fourth witness named?</p> <p>24 A. I do.</p> <p>25 Q. And you see it says, "Defendant expects to</p>	<p style="text-align: right;">Page 60</p> <p>1 BY MS. GOVERNSKI:</p> <p>2 Q. Have you had any conversations with</p> <p>3 Mr. Giuliani about testifying at a trial?</p> <p>4 A. No.</p> <p>5 Q. Do you have any idea what trial this</p> <p>6 document refers to?</p> <p>7 A. I don't.</p> <p>8 Q. Do you have any idea what the topics of the</p> <p>9 upcoming trial is about?</p> <p>10 A. No.</p> <p>11 Q. If you look at topics of testimony on</p> <p>12 page 2, it's the fifth box. Do you see where I am,</p> <p>13 "Topics of Testimony" the fifth column --</p> <p>14 A. Uh-huh.</p> <p>15 Q. -- in this chart on page 2?</p> <p>16 A. Yes.</p> <p>17 Q. And I'm looking at the -- your row where</p> <p>18 your name is listed and it says, "Discussions of Rudolph</p> <p>19 W. Giuliani's relocation from his New York City</p> <p>20 cooperative apartment to his Palm Beach County, Florida</p> <p>21 condominium as his homestead property prior to</p> <p>22 December 31, 2023."</p> <p>23 Do you see that?</p> <p>24 A. I see it.</p> <p>25 Q. And is there anything about this topic that</p>
<p style="text-align: right;">Page 59</p> <p>1 present..." do you see that --</p> <p>2 A. Uh-huh.</p> <p>3 Q. -- in the fourth box?</p> <p>4 A. Right.</p> <p>5 Q. Do you plan to testify in this case?</p> <p>6 A. I have no plans of that kind, no.</p> <p>7 Q. Have you been asked --</p> <p>8 A. No.</p> <p>9 Q. -- to testify?</p> <p>10 When is -- when is the first time you</p> <p>11 became aware that Mr. Giuliani was listing you as a</p> <p>12 witness?</p> <p>13 A. When you handed me this document.</p> <p>14 Q. Prior to this point, you had no</p> <p>15 understanding --</p> <p>16 A. No.</p> <p>17 Q. -- that you would be asked to testify?</p> <p>18 A. Other than this -- this deposition, no.</p> <p>19 Q. Okay. And have you ever had any</p> <p>20 conversations with Mr. Giuliani regarding this</p> <p>21 deposition?</p> <p>22 A. Oh, no.</p> <p>23 MR. CAMMARATA: Objection, asked and</p> <p>24 answered.</p> <p>25</p>	<p style="text-align: right;">Page 61</p> <p>1 we have not discussed?</p> <p>2 A. No.</p> <p>3 Q. Have we exhausted your recollection</p> <p>4 regarding this topic?</p> <p>5 A. Completely.</p> <p>6 Q. And does seeing the topics of the testimony</p> <p>7 change or alter your testimony that you provided today in</p> <p>8 any way?</p> <p>9 A. No.</p> <p>10 Q. Okay. Mr. Mon- -- I'm sorry, Monsignor</p> <p>11 Placa.</p> <p>12 A. The pope would appreciate that. I don't</p> <p>13 care.</p> <p>14 Q. It's a mouthful but I'm happy to respect</p> <p>15 it.</p> <p>16 You understand that you are here today</p> <p>17 pursuant to a subpoena?</p> <p>18 A. Yes.</p> <p>19 Q. You actually brought some documents with</p> <p>20 you today?</p> <p>21 A. I did.</p> <p>22 Q. What documents did you bring with you? Can</p> <p>23 you describe what -- what you brought?</p> <p>24 A. Why don't we give those back to you so we</p> <p>25 don't mess them up.</p>

<p style="text-align: right;">Page 62</p> <p>1 These documents were served on me at my 2 front door. I was in pajamas, it was at 7 o'clock in the 3 morning. That's what they are. 4 Q. And I see that you took some notes. 5 A. No. No. That was the process server. 6 Q. Process server. 7 Okay. We're going to hand you a clean 8 copy, if you don't mind. 9 A. Uh-huh. 10 Q. Have you taken any notes on those copies -- 11 A. No. 12 Q. -- that you have? 13 A. No. 14 Q. Okay. 15 MS. GOVERNSKI: We're going to mark Tab 34. 16 (Placa Exhibit 3, Plaintiffs' Notice of 17 Deposition of Monsignor Alan Placa, was marked for 18 identification.) 19 BY MS. GOVERNSKI: 20 Q. This will be marked Placa Deposition 21 Exhibit 3 -- 22 A. Uh-huh. 23 Q. -- which is the document titled Plaintiffs' 24 Notice of Deposition of Monsignor Alan Placa. 25 Do you see that, sir?</p>	<p style="text-align: right;">Page 64</p> <p>1 but no, I have not produced any. 2 Q. Well, you testified earlier that you have 3 calendar entries relating to Mr. Giuliani's presence in 4 Palm Beach, right? 5 A. I would make a note in my calendar that I 6 was going to visit him, yeah. 7 Q. Okay. If I can direct your attention to 8 Document Request 2, which asks for all documents and 9 communications relating to Defendant Giuliani's travel 10 between July 1st, 2023, and August 8, 2023. 11 A. '24. 12 Q. I'm sorry. Thank you. 2024. You see that 13 that's what Document Request Number 2 requests? 14 A. Yes. 15 Q. Okay. So -- and your calendar entries 16 regarding his presence in Palm Beach County, would you 17 interpret Request Number 2, that those documents would be 18 responsive to it? 19 A. I'm sorry, please repeat that. 20 Q. Yes, thank you. That was a poorly worded 21 question. 22 Do you understand that your calendar 23 entries regarding Mr. Giuliani's travel to Palm Beach 24 during 2023 and 2024 would be responsive to document 25 Request Number 2?</p>
<p style="text-align: right;">Page 63</p> <p>1 A. I do. 2 Q. And is this the deposition subpoena that 3 you received and that -- a copy of which you brought here 4 today? 5 A. I mean, until I read it, I can't answer 6 that. 7 Q. Take a moment, look at it, and just let me 8 know. I just want to make sure it is the same. 9 A. (Complies.) 10 This is the document in which I was served. 11 Q. Okay. Thank you for checking. 12 This document, which has been marked as 13 Placa Deposition Exhibit 3 -- 14 A. Three. 15 Q. -- if I could please direct your attention 16 to page 6 where it says "Documents to be Produced." 17 Do you see that? 18 A. Yes. 19 Q. Do you understand that this deposition 20 subpoena requested that you produce a number of 21 documents, types-- categories of documents? 22 A. Uh-huh. 23 Q. Have you produced any documents in 24 response -- 25 A. No, I don't have any documents to produce,</p>	<p style="text-align: right;">Page 65</p> <p>1 A. Yes, if they are here. I mean, I haven't 2 looked through my calendar but... 3 Q. So to the extent you have documents 4 reflecting Mr. Giuliani's travel between these dates, you 5 would understand that those would have to be produced 6 pursuant? 7 A. Sure. 8 Q. So after this deposition, would you look 9 and produce those documents? 10 A. I'd be happy to. 11 Q. Okay. What efforts have you taken to look 12 through the remainder of the requests to see if you have 13 any responsive documents? 14 A. I haven't. 15 Q. You haven't? 16 A. No, I haven't. 17 Q. What efforts, if any, have you taken to 18 understand if you have any documents responsive to this 19 documents request? 20 A. Again, I read through them quickly 21 and didn't feel that I had anything that was responsive 22 at all. 23 Q. And so you didn't produce documents based 24 on feeling like you didn't have any documents? 25 A. No.</p>

17 (Pages 62 - 65)



<p style="text-align: right;">Page 66</p> <p>1 Q. But not based on having actually searched?</p> <p>2 A. I didn't search, no.</p> <p>3 Q. Okay. If you can, please, just turn back</p> <p>4 to page 1 of this document -- I'm sorry, page 3, the</p> <p>5 first page of the subpoena where it says "Subpoena to</p> <p>6 Testify at a Deposition." Do you see that?</p> <p>7 A. Uh-huh.</p> <p>8 Q. And you see there is a box checked that</p> <p>9 states "production." Do you see that?</p> <p>10 A. I do.</p> <p>11 Q. And it says, "You or your representatives</p> <p>12 must also bring with you to the deposition the following</p> <p>13 documents. Electronically stored information or objects,</p> <p>14 and must permit inspection, copying, testing, or sampling</p> <p>15 of the material to pull in certified response to all</p> <p>16 discovery requests in attached Schedule A served on or</p> <p>17 before two days prior to the day of the deposition."</p> <p>18 Do you see that?</p> <p>19 A. I see it. I don't understand it but I see</p> <p>20 it.</p> <p>21 Q. But you understand that this stated that</p> <p>22 you were to -- that you must bring the responsive</p> <p>23 documents to the deposition today?</p> <p>24 A. I understand that.</p> <p>25 Q. Did you do that?</p>	<p style="text-align: right;">Page 68</p> <p>1 THE VIDEOGRAPHER: Coming back on the video</p> <p>2 record. The time is 5:17 p.m.</p> <p>3 BY MS. GOVERNSKI:</p> <p>4 Q. Monsignor Placa, have you spoken with</p> <p>5 anyone about your testimony during the break?</p> <p>6 A. No.</p> <p>7 Q. Anything about your previous testimony that</p> <p>8 you want to change or correct?</p> <p>9 A. I wish I could remember anything I say. So</p> <p>10 no, I don't want to change.</p> <p>11 Q. But there is no reason --</p> <p>12 A. No.</p> <p>13 Q. -- that you shouldn't remember what you</p> <p>14 said, right?</p> <p>15 A. No.</p> <p>16 Q. Okay. I'm handing you what is being marked</p> <p>17 as Placa Deposition Exhibit 4.</p> <p>18 (Placa Exhibit 4, LinkedIn Profile, was</p> <p>19 marked for identification.)</p> <p>20 BY MS. GOVERNSKI:</p> <p>21 Q. Which is a copy of your LinkedIn resume.</p> <p>22 Do you see this?</p> <p>23 A. I do.</p> <p>24 Q. Is this document Placa Exhibit 4 accurate?</p> <p>25 A. Yes, it is.</p>
<p style="text-align: right;">Page 67</p> <p>1 A. In here, I did. But not in here, I didn't.</p> <p>2 Q. But you have not given us any of those</p> <p>3 documents, right?</p> <p>4 A. Right. I'm happy to do that but I have not</p> <p>5 done it.</p> <p>6 Q. Okay. I am at -- we've been going about an</p> <p>7 hour. I have about an hour left. Do you want to take a</p> <p>8 break or do you want to keep going?</p> <p>9 A. I want to go home.</p> <p>10 Q. I'm sorry. I just have about an hour left,</p> <p>11 but I'm happy to give you a break if you want one.</p> <p>12 A. No, I'm okay.</p> <p>13 Q. Okay. Let's keep going.</p> <p>14 Okay. I'm going to hand you --</p> <p>15 MS. GOVERNSKI: Does anyone else need a</p> <p>16 break?</p> <p>17 THE VIDEOGRAPHER: I was just going to say</p> <p>18 Veritext has a 90-minute media unit. So at 90</p> <p>19 minutes we're going to have to do a hard stop.</p> <p>20 MS. GOVERNSKI: Oh, so let's take a break</p> <p>21 now then, and then we'll come back. Okay. Take</p> <p>22 just a five-minute break, if that's okay?</p> <p>23 THE VIDEOGRAPHER: Going off the video</p> <p>24 record. The time is 5:08 p.m.</p> <p>25 (A recess is taken.)</p>	<p style="text-align: right;">Page 69</p> <p>1 Q. Okay. And under Experience, it lists your</p> <p>2 role as senior vice president with Giuliani Partners; is</p> <p>3 that right?</p> <p>4 A. That's correct.</p> <p>5 Q. What do you do as a senior vice president?</p> <p>6 A. Nothing.</p> <p>7 Q. I'm sorry?</p> <p>8 A. Nothing.</p> <p>9 Q. Do you -- is that still your title?</p> <p>10 A. It may be, but, I mean, I haven't used the</p> <p>11 title in a long time.</p> <p>12 Q. Are you still employed by Giuliani</p> <p>13 Partners?</p> <p>14 A. Can you define employed?</p> <p>15 Q. Why don't you tell me. It's listed on your</p> <p>16 LinkedIn profile, right, as experience, August 2022 to</p> <p>17 present, right?</p> <p>18 A. Right.</p> <p>19 Q. Is that accurate?</p> <p>20 A. I believe so. I mean, it never had any</p> <p>21 responsibility. I didn't do anything.</p> <p>22 Q. Did you ever do anything for Giuliani</p> <p>23 Partners?</p> <p>24 A. No.</p> <p>25 Q. Were you paid by Giuliani Partners?</p>

<p style="text-align: right;">Page 90</p> <p>1 record for five minutes.</p> <p>2 THE VIDEOGRAPHER: Going off the video</p> <p>3 record. The time is 5:36 p.m.</p> <p>4 (A recess is taken.)</p> <p>5 THE VIDEOGRAPHER: Coming back on the video</p> <p>6 record. The time is 5:38 p.m.</p> <p>7 BY MS. GOVERNSKI:</p> <p>8 Q. Monsignor Placa, did you have any</p> <p>9 conversations about your testimony with anyone during the</p> <p>10 break?</p> <p>11 A. No.</p> <p>12 Q. Is there any aspect of your testimony that</p> <p>13 you would like to change as you sit here today?</p> <p>14 A. No.</p> <p>15 Q. Is there anything else that you have not</p> <p>16 shared today regarding the topics that we've discussed?</p> <p>17 A. No.</p> <p>18 MS. GOVERNSKI: I have no further</p> <p>19 questions.</p> <p>20 MR. CAMMARATA: Thank you.</p> <p>21 THE WITNESS: God is good.</p> <p>22 THE VIDEOGRAPHER: Would either party like</p> <p>23 a copy of the video?</p> <p>24 MS. GOVERNSKI: We would like the video and</p> <p>25 the transcript.</p>	<p style="text-align: right;">Page 92</p> <p>1 CERTIFICATE OF OATH OF WITNESS</p> <p>2</p> <p>3 STATE OF FLORIDA )</p> <p>4 COUNTY OF ST. LUCIE )</p> <p>5</p> <p>6 I, the undersigned Notary Public, in and</p> <p>7 for the State of Florida, hereby certify that MONSIGNOR</p> <p>8 ALAN PLACA personally appeared before me, produced ID and</p> <p>9 was duly sworn.</p> <p>10</p> <p>11 WITNESS MY HAND and official seal in the</p> <p>12 City of Fort Pierce, County of St. Lucie, State of</p> <p>13 Florida this December 30, 2024.</p> <p>14</p> <p>15</p> <p>16</p> <p>17 </p> <p>18 JENNIFER L. BUSH, KPK, FPR, FPR-C</p> <p>19 Notary Public</p> <p>20 State of Florida at Large.</p> <p>21 My Commission: #HH 529563</p> <p>22 My commission expires: 9/20/28</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 91</p> <p>1 MR. CAMMARATA: I'll get the transcript.</p> <p>2 THE VIDEOGRAPHER: This concludes the</p> <p>3 deposition of Alan Placa. Going off the video</p> <p>4 record. The time is 5:39 p.m.</p> <p>5 (The proceeding is adjourned at 5:39 p.m.)</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 93</p> <p>1 CERTIFICATE OF REPORTER</p> <p>2</p> <p>3 STATE OF FLORIDA )</p> <p>4 COUNTY OF ST. LUCIE )</p> <p>5 I, Jennifer L. Bush, Registered</p> <p>6 Professional Reporter, Florida Professional Reporter, do</p> <p>7 hereby certify that I was authorized to and did</p> <p>8 stenographically report the deposition of MONSIGNOR ALAN</p> <p>9 PLACA; and that a review of the transcript was requested;</p> <p>10 and that pages 1 through 96, inclusive, are a true record</p> <p>11 of my stenographic notes.</p> <p>12 I further certify that I am not a relative,</p> <p>13 employee, attorney or counsel of any of the parties, nor</p> <p>14 am I a relative or employee of any of the parties,</p> <p>15 attorneys or counsel connected with the action, nor am I</p> <p>16 financially interested in the action.</p> <p>17</p> <p>18 Dated this December 30, 2024.</p> <p>19</p> <p>20 </p> <p>21 JENNIFER BUSH, KPK, FPR, FPR-C</p> <p>22</p> <p>23</p> <p>24 The foregoing certification of the</p> <p>25 transcript does not apply to any reproduction of the same</p> <p>by and means unless under the direct control and/or</p> <p>direction of the certifying reporter.</p>